

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**REVISED RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS EMILY ROSENBERG
TO GREETING CARD ASSOCIATION INTERROGATORIES
GCA/USPS-T3-20 THROUGH 23 AND 46
[ERRATA]**

The United States Postal Service hereby files the revised responses of witness Emily Rosenberg to the above-listed interrogatories of the Greeting Card Association. These responses supersede the previously filed original responses to GCA/USPS-T3-20 through 23 (February 28, 2012) and 46 (March 20, 2012). Each interrogatory is stated verbatim and followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO GREETING CARD ASSOCIATION INTERROGATORY**

Revised: March 29, 2012

GCA/ USPS–T3-20 On the first page appended to your testimony, for each operation under VOLUME, please state the current machine efficiency percentage.

RESPONSE

See the revised response to GCA/USPS–T3-46.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO GREETING CARD ASSOCIATION INTERROGATORY**

Revised: March 29, 2012

GCA/ USPS–T3-21

- (a) On the first page appended to your testimony under WORKLOAD WINDOWS, please explain why in the newly proposed network cancellation would have a labor efficiency of only 52 percent, whereas the other windows would have labor efficiencies of 70 percent to 84 percent?
- (b) You state labor efficiency is measured as “the ratio of current labor work-hours to expected labor workhours”. Please define “expected labor workhours” as that expression is used here. (Does 52 percent, for example, mean then that there will be roughly double the labor workhours after network rationalization than there are now?) Please explain your answer fully.

RESPONSE

- (a-b) See the response to GCA/USPS–T3-48.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO GREETING CARD ASSOCIATION INTERROGATORY**

Revised: March 29, 2012

GCA/ USPS–T3-22 On the first page appended to your testimony under VOLUME please provide, or give citations to, a full description of each operation listed.

RESPONSE

For the scoring tool, the Acronyms under the Volume section of the “Assumptions” worksheet of Library Reference 14 are as follows:

CANC – Letter Cancellation Workload

L-OGP – Letter Outgoing Primary

L-INP – Letter Incoming Primary

L-INS – Letter Incoming Secondary and Delivery Point Sequencing

F-OGP – Flat Outgoing Primary

F-OGS – Flat Outgoing Secondary

F-INP – Flat Incoming Primary

F-INS – Flat Incoming Secondary

P-OGP – Parcel Outgoing Primary

P-INP – Parcel Incoming Primary

PRI – Priority (Outgoing and Incoming)

Intl – International

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO GREETING CARD ASSOCIATION INTERROGATORY**

Revised: March 29, 2012

GCA/USPS-T3-23

- (a) On the first page appended to your testimony, under EQUIPMENT, please explain whether a blank space under the square foot column means the machinery (i) is part of current inventory but not in use at present, or (ii) is part of current inventory but will not be after network realignment, or (iii) something else. If your answer is (iii), please explain fully the meaning of the blank space.
- (b) Does the “# available” column for the row “Automation” under EQUIPMENT mean that the current inventory of all automation equipment is 7,503, and that 12 the subsequent rows in that column break that total down by type of machine? Please explain your answer.
- (c) Why is the average per square feet per machine identical at 2,491 as between the rows labeled “Automation” and “DBCS”?

RESPONSE

- (a) This model was built based on letter volume. The two categories Automation and AFCS capture the letter processing equipment used in the model. Automation, as shown in cell D47 is the sum of CIOSS, DIOSS, CSBCS, and DBCS). Thus, letter equipment is accounted for and multiplied by the associated square footage. The remaining missing square footage was not required as it was not used for this analysis.
- (b-c) See the response to part (a).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO GREETING CARD ASSOCIATION INTERROGATORY**

Revised: March 29, 2012

GCA/ USPS-T3-46

GCA/USPS-T3-46: The correct reference for the questions posed in GCA/USPS-T3-20 - 23 is LR 14_REP, Excel File 14_mail processing window scoring tool. There is no page number for the page in question, but there is an explanatory paragraph at the top of the page which begins: "When generating results, the tool calculates savings one scenario at a time." With this clarification in mind, please answer the four cited interrogatories.

RESPONSE

The term "machine efficiency" was coined for modeling. There is no metric that measures machine efficiency in this context. See the revised responses to GCA/USPS-20 – 23.